

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON VICINAGE

**The Doris Behr 2012 Irrevocable
Trust,**

Plaintiff,

v.

Johnson & Johnson,

Defendant.

Case No. 3:19-cv-8828-MAS-LHG

**PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE WHY
THE COURT SHOULD NOT STAY THIS CASE**

On December 20, 2019, this Court ordered the parties to show cause why the case should not be stayed pending the Delaware Supreme Court's disposition of *Salzberg v. Sciabacucci*, No. 346,2019. The plaintiff believes that a stay of proceedings is appropriate in light of the Delaware Supreme Court's pending decision in *Sciabacucci*, given that the defendant relies extensively on the Delaware Court of Chancery's opinion in that case. The plaintiff respectfully asks the Court to stay the proceedings in this case pending the Delaware Supreme Court's resolution.

Respectfully submitted.

JONATHAN F. MITCHELL *
Mitchell Law PLLC
106 East Sixth Street, Suite 900
Austin, Texas 78701
(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law

/s/ Walter S. Zimolong
WALTER S. ZIMOLONG
Zimolong LLC
P.O. Box 552
Villanova, PA 19085
(215) 665-0842
wally@zimolonglaw.com

HAL S. SCOTT*
Harvard Law School
1557 Massachusetts Avenue
Cambridge, Massachusetts 02138
(617) 495-4590
hscott@law.harvard.edu

* *pro hac vice* applications pending

Dated: January 1, 2020

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on January 1, 2020, I served this document by CM/ECF upon:

ANDREW MUSCATO
Skadden, Arps, Slate, Meagher & Flom LLP
Four Times Square
New York, New York 10036
(212) 735-3000 (phone)
(212) 735-2000 (fax)
andrew.muscato@skadden.com

Counsel for the Defendant

/s/ Walter S. Zimolong
WALTER S. ZIMOLONG
Counsel for Plaintiff